

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13

KELLY MCINTYRE : 19-15255ELF

**DEBTORS' MOTION TO EXTEND THE CHAPTER 13 PLAN FOR A  
70-MONTH PERIOD PURSUANT TO THE CARES ACT**

AND NOW, this 30th day of April 2021, Debtor(s) hereby files this Motion seeking for Court Approval to extend the Chapter 13 Plan for a 70-month period, for the following reasons:

1. Debtors filed this Chapter 13 Bankruptcy on September 08/22/2019
2. Debtor's Bankruptcy was confirmed on March 24, 2020.
3. Debtor has paid the trustee a total of \$14,928.00 to date.
4. Debtor became ill with Covid-19 and was out of work for several months thereafter.
5. Debtor became ill again more recently and was hospitalized and unable to work again, for several months after two surgeries.
6. Debtor's spouse, a self-employed contractor, continues to struggle from the shut down and the decrease in work due to Covid-19.
7. Due to Debtor's incapacity to work for an extended period of time, and her husband's reduction of work, Debtor became in arrears with both the Chapter 13 Trustee and her mortgage company, Deutsche Bank National Trust.
8. In order to resolve the arrearages with the Chapter 13 Trustee and the mortgage company, Debtor is seeking an extension of her sixty (60) month plan to a seventy (70) month plan, so that she can afford the increased payments.
9. Debtor is back to work full time and her spouse is continuing to see an

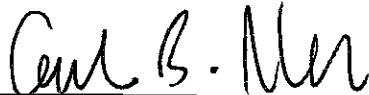
increase in business, therefore, debtor believes she is able to make her payments going forward.

10. The requested additional 10 months to her plan will enable the Debtors to successfully pay all of their regular monthly obligations as well as their obligations set forth in the proposed Chapter 13 Plan, attached hereto and incorporated herein by reference as if set forth at length and marked Debtors' Exhibit "A".

11. Debtors seek relief from this Honorable Court in order to repay all of their obligations pursuant to this Plan.

**WHEREFORE**, Debtor(s) ask(s) this Honorable Court to Grant their Motion to Extend their Chapter 13 Plan to a 70-month period.

Respectfully submitted:



---

Carol B. McCullough, Esquire, I.D. 56424  
MCCULLOUGH EISENBERG, L.L.C  
65 West Street Road, Suite A-204  
Warminster, PA 18974  
Tel. 1-215-957-6411